

## **REMARKS**

By this amendment, claims 1-10 are amended and new claims 11-16 have been added. Currently, claims 1-16 are pending in the application. Accordingly, claims 1-16 are currently active in this application, of which claim 1 and claim 11 are independent.

Applicants respectfully submit that the above amendments and new claims do not add new matter to the application and are fully supported by the specification. In view of the above Amendments and the following Remarks, Applicants respectfully request reconsideration and withdrawal of the objections and rejections for the reasons discussed below.

## **ALLOWED/ALLOWABLE CLAIMS**

Applicants appreciate the indication that claim 5 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

## **OBJECTION TO THE CLAIMS**

Claims 3 was objected to because of the following informalities. This objection is respectfully traversed.

Claim 3 includes a typographical error for "ethyl acetate (EL)." The intended solvent based on the specification at page 5, line 15 discloses ethyl lactate (EL), which is the intended solvent.

Thus, claim 3 has been amended to correct this typographical error.

Accordingly, Applicant respectfully requests withdrawal of the objection to claim 3.

This amendment is not made for the purpose of avoiding prior art or narrowing the claimed invention, and no change in claim scope is intended. Therefore, Applicant does not intend to relinquish any subject matter by these amendments.

### REJECTION OF CLAIMS UNDER 35 U.S.C. §102

Claims 1 – 3, and 6 – 10 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,346,799, issued to Jeffries, III, et al. ("Jeffries"), or U.S. Patent No. 5,324,620, issued to Ebersole ("Ebersole"). Applicants respectfully traverse this rejection for at least the following reasons.

Claim 1, as amended, describes a photoresist composition:

A photoresist composition for a multi-micro (MMN) head coater comprising:

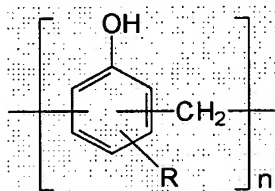
(a) 5 to 30 wt% of a polymer resin represented by the following Chemical Formula 1;

(b) 2 to 10 wt% of a diazide photoactive compound;

(c) 50 to 90 wt% of an organic solvent; and

(d) 500 to 4000 ppm of a Si-based surfactant:

Chemical Formula 1



wherein R is C<sub>1</sub> to C<sub>4</sub> alkyl, and n is an integer of 15 to 10,000.

As a preliminary matter, Applicants respectfully assert that the Examiner has failed to establish a *prima facie* case of obviousness. First, the Examiner has failed to specifically demonstrate how Jeffries and Ebersole suggest to one of ordinary skill in the

art the compositions of independent claim 1. While the Examiner has provided a listing of components of a composition allegedly taught by Jeffries and Ebersole, the mere listing of the components fails to relate the claimed ranges and fails to relate how or why one of ordinary skill in the art would have manipulated the ranges provided in Jeffries and Ebersole to produce the claimed ranges of the present invention.

Second, the Examiner has failed to relate how Jeffries and Ebersole would have provided one of ordinary skill in the art with a reasonable expectation of success in producing the compositions of independent claim 1.

Accordingly, Applicant respectfully requests withdrawal of the 35 U.S.C. §102(b) rejection of claims 1 – 3 and 6 – 10.

#### **REJECTION OF CLAIMS UNDER 35 U.S.C. §103**

Claims 1 – 4 and 6 – 10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 5,346,799 issued to Jeffries, III, et al. ("Jeffries") or U.S. Patent No. 5,324,620 issued to Ebersole ("Ebersole") in view of U. S. Patent No. 5,853,949 issued to Kodama, et al. ("Kodama"). Applicants respectfully traverse this rejection for at least the following reasons.

As stated above, primary references Jeffries and Ebersole do not teach the specific ranges of the components as recited in claim 1, as amended. Further, the secondary reference Kodama does not fill the deficiencies of the primary references, Jeffries and Ebersole.

Kodama merely describes the use of a crosslinking agent in a positive working photoresist composition. Kodama does not teach the use of specific concentrations of particular components in a photoresist composition.

Thus, the proposed combination of primary references Jeffries and Ebersole with secondary reference Kodama all fail to teach the photoresist composition, as recited in claim 1.

Accordingly, Applicants respectfully request withdrawal of the 35 U.S.C. §103(a) rejection of claims 1 – 4 and 6 – 10.

#### **NEW CLAIMS**

Claims 11-16 are newly added to describe a method for applying a photoresist composition to an MMN head coater. An adequate description and support for the new claims are provided in the specification, for example, page 4, line 14 to page 6, line 17.

#### **OTHER MATTERS**

In addition to the amendments mentioned above, claims 1-10 are amended solely for the purposes of informality correction, better wording, and clarification. These amendments are not made for the purpose of avoiding prior art or narrowing the claimed invention, and no change in claim scope is intended. Therefore, Applicant does not intend to relinquish any subject matter by these amendments.


## CONCLUSION

Applicant believes that a full and complete response has been made to the Office Action and respectfully submits that all of the stated objections and grounds for rejection have been overcome or rendered moot. Accordingly, Applicant respectfully submits that all pending claims are allowable and that the application is in condition for allowance.

Should the Examiner feel that there are any issues outstanding after consideration of this response, the Examiner is invited to contact the Applicant's undersigned representative at the number below to expedite prosecution.

Prompt and favorable consideration of this Reply is respectfully requested.

RESPECTFULLY SUBMITTED,

  
HAE-CHAN PARK  
REG. NO. 50,114

DATE: 17 JUNE 2005

**McGuireWoods LLP**  
1750 TYSONS BOULEVARD  
SUITE 1800  
MCLEAN, VA 22102-4215  
TEL: 703-712-5365  
FAX: 703-712-5280  
HCP:STS/TMF